

Malvern Hills AONB Nature Recovery Plan

Responses to the consultation on the draft Plan: 10th January – 18th February 2022

Responses received

Colwall Orchard Group
Colwall Parish Council
Gloucestershire County Council
Gloucestershire Wildlife Trust
Herefordshire and Worcestershire Earth Heritage Trust
Historic England
Individual landowner
Individual landowner
Individual landowner
Individual wildlife specialist
Malvern Crayfish Group
Malvern Hills District Council
Malvern Hills Trust
Malvern Wells Parish Council
National Farmers' Union, West Midlands Region
Natural England
Save our Malvern Skylarks
Wellington Heath Parish Council
Worcestershire County Council (Environmental Policy team)
Worcestershire Wildlife Trust

Responses received using the online survey

In the following table, **bold text** has been used to highlight specific suggestions for changes to the document. To preserve the confidentiality of respondents some text has been redacted.

THE INTRODUCTION TO THE PLAN

3. Please give any comments you have on the Introduction section.

Comment	Assessment	Action
Although relevant to a very small part of Gloucestershire the NRP introduction for the MHAONB provides some useful potential text and ideas for our Local Nature Recovery Plan due to be adopted in 2023 with a draft later this year due. The broad audience target of the Plan is welcomed. The 'What do we mean by nature' sub-section should include the term 'biodiversity' least not due to later reference to 'Biodiversity Net Gain'. Suggest first sentence of sub section could become something like - 'Wildlife (species) together with habitats and wider ecosystems represent our biodiversity but the focus on nature in this Plan also includes water, soils and the underlying geology of the Malvern Hills'. I assume by 'wildlife' throughout the plan you are referring only to species although it is can also be used to include habitats too?	Small addition	Add 'biodiversity'
General comment: It is good to see in the NRP a clear appreciation of the importance of the geology base, as indeed intended by Natural England. The new section in draft 2 on the "Nature of the AONB" is an interesting description of the	Clarification suggested	Add suggested text

<p>effect of geology on the plant and insect life. However there a number of technical and other points which would like you to consider.</p>	
<p>This is a Plan for everyone who has influence over, and benefits from, nature in the Malvern Hills AONB. It is the decisions of the many private landowners, including farmers and estates, that will have the greatest effect on nature. They need the right balance of incentives, guidance and regulation, provided by public bodies and environmental organisations, to guide and support their decisions. Local residents and visitors also have a role to play, as consumers of what the countryside provides and as stewards of nature in their own gardens and neighbourhoods.</p>	
<p>Comes across a slightly divisive - with an us and them feel, rather than inclusive, everyone acting together to deliver the plan. Its the use of THEY at start of 2nd sentence... Introduction could also reference the need to move away from more intensive and potentially harmful land use and land management practices in order to embrace the restoration of the natural environment.</p>	<p>Clarification suggested Paragraph restructured. No change considered necessary Small addition</p>
<p>Really pleasing to see the intentions for nature, people and the AONB as a whole. Connections are going to be key for biodiversity, climate change resilience and bringing people back to nature for the foreseeable future.</p>	
<p>We support and fully endorse the five underpinning principles set out in the executive summary of the plan. They are fundamental in delivering a 21st century vision for the AONB and nature’s recovery. We are similarly supportive of the commentary on pages one and two and welcome the recognition given by the plan to the fact that ‘Recovering nature across the AONB also requires targeted change in the spaces between [existing] special places.’ This approach, which seeks to not only protect and restore but also to better link nature-rich elements of the AONB will be essential in delivering the ambitious aims of the plan. We also support the commentary around the importance of the AONB as part of the regional nature recovery network.</p>	
<p>Thank you for the opportunity to comment on the draft NRP. We appreciate that a great deal of work has gone into it, and that developing a coherent plan against a rapidly changing policy background has been no small undertaking.</p>	
<p>Overall, we found it thoughtful, detailed and comprehensive, and we support the Guiding Principles, Priorities and Delivery Plan. There is nothing with which we disagree, but we offer some points of emphasis/amplification for your consideration.</p>	
<p>Goal/Future State. We fully support the NRP’s goal to reverse the loss of nature in the AONB, but suggest that, in addition to the mapping, it would be useful to include some text describing the ‘future state’ to which the MHAONB aspires, ie a short description of what success will look like, which could in turn be linked to targets and measurements of progress.</p>	<p>Suggested addition of a ‘future state’ of nature (i.e. a vision). No change. Insufficient consensus to write this and it will need further consultation Potential to develop in future</p>
<p>Interim Plan. It is noted that the MHAONB propose to develop the NRP further when there is a clearer picture about how burgeoning nature recovery strategies and environment schemes will work. This may be why it tends to come across more as a statement of policy than a plan at this stage. It would be good to see some targets in the next iteration against which progress could be measured.</p>	<p>Recommendation for next iteration of the Plan. Noted and agree could be useful Suggested use of the term ‘rewilding’.</p>
<p>Innovative ways to protect nature. The Plan rightly references Professor Sir John Lawton’s seminal report ‘Making Space for Nature’, and the urgent need to reverse diversity loss. A key tenet of his report, which underpins local nature recovery strategies and plans, is that in view of the growing threat of climate change, ‘traditional’ methods of nature conservation will not suffice; and society needs to find innovative ways to protect and enhance wildlife. We welcome the fact that in its Guiding</p>	<p>Previously considered but concerns over perceptions by farming community. Rewilding at a landscape scale may not be suitable for a cultural landscape like the MHAONB but potential for rewilding</p>

Principles, the NRP recognises that ‘the past isn’t necessarily a guide to the future’. The Plan also recognises (eg under ‘A changing place for Nature’, p9) that new approaches such as more tree planting and flooded areas, will be needed to help nature recover. All this suggests that the authors could afford to be less cautious about using terms/concepts such as ‘rewilding’, which are no longer seen as radical in the environmental sector and could have an important role in the Plan.		type change isn’t ruled out of plan.
The desire to engage with and join up with other plans and initiatives is welcomed. FIPL is mentioned in “how this document can be used” but the acronym isn’t given in full until the action plan, may want to amend for ease of understanding.	Clarification suggested	Reference to FiPL removed at this point.
The plan is a well written document with a clear goal. Scope is clearly defined and good plans for rural area & conservation of important nature like verges & hedgerows. Can we have an explicit mention of ‘ecosystem services’ in this section, to tie the document together with regards to the mapping in Appendix 1? The concept is broadly described at the start of the bit titled ‘what do we mean by nature?’ but the term isn’t actually used. Can we also refer to the Biodiversity Action Plan, perhaps in the bit titled 'Relationship with other plans and policies', which Worcestershire certainly still has a current edition of, even if other counties don't.	Clarification suggested	Reference to ecosystem services added. Reference to the Worcs BAP (and also the AONB MP) added.
A good general introduction to the document. This section provides a good summary of the state of nature with useful links to independent evidence. It reads as a high-level, background document with a lot of small text that probably won't 'sell' the plan to many folk. It promises us 'an inspiring vision of what is possible' but I can't find a vision for the AONB nor any feature of it in the whole plan.	Clarification	‘Vision’ changed to ‘prospectus’
We support an approach to nature recovery that, in the process of maximising natural environmental benefits, identifies mutual opportunities to achieve historic environment benefits and minimises adverse effects. We welcome the recognition of the importance of the historic and cultural landscapes of the Malvern Hills to supporting habitats and biodiversity, and the importance of land management practices that sustain both their natural and cultural value. We also welcome a managed approach to nature recovery and increasing biodiversity, that takes advantage of existing natural and cultural values in the varied landscape of the Malvern Hills AONB. We would like to see the introduction include clear reference that the nature recovery plan will need to be developed in a way that recognises and safeguards other special qualities of the AONB including the historic environment. We feel this helps guide those who may refer to the plan in developing their actions and proposals to consider other values that land may have and aligns the plan with the AONBs primary purpose to ‘conserve and enhance the natural beauty of the area’	Addition	Sentence added to third para. p 1.

THE NATURE OF THE AONB

4. If you have any comments, corrections or suggested additions to the section on the Nature of the AONB, state them here.

Comment	Assessment	Action
Page 1 first para. The Abberley and Malvern Hills is not part of the UNESCO/Eurpean Geopark Network, and is not therefore 'internationally recognised'. This phrase is best removed.	Correction	'internationally recognised' removed.
Page 1 Geology Map. It is appreciated that the map is an approximation, but we are baffled by the depiction of the distribution of magic and	Revision to map	No change. Map in the report is taken directly

<p>felsic rocks. This doesn't really work for a map on this scale, and moreover doesn't accord with the current on-line official BGS map. In reality, there are frequent marked changes in the rock type across the entire length of the hills, creating potentially a huge range of microhabitats. We suggest it would be simpler to avoid confusion by (a) having one colour for the whole Malverns Complex, eg have a look at the iGeology app - and (b) by adding a line in the text, stating that the igneous and metamorphic rocks of the hills vary considerably in their composition.. Hence the need for the use of the term 'Complex'</p> <p>Page 1 Map Key. 'Warren complex' should be 'Warren House Formation'. 'Silurian Limestone should be place above 'Llandovery mud and siltstones', which are older stratigraphically.</p> <p>Page 3 Last paragraph. We appreciate that disused quarries now get a mention, but this is not followed up in the more detailed plans later in the document.</p> <p>Page 4 fossil figure caption. should be Favourites, not Favourite.</p> <p>Page 5 second paragraph. The gravels mentioned on eg Castlemorton Common, are solifluction deposits (from the Ice Age), and are comprised of variable amounts of clay, silt, and sand, as well as gravels. These deposits are spread on both sides of the hills and affect the soils and agricultural practice. On the eastern side, solifluction sheets merge lower down the slope with the terraces of the Severn. We note that there appears to be sufficient space on page 5 to incorporate this clarification.</p>	<p>suggested.</p> <p>Correction</p> <p>Noted</p> <p>Correction</p> <p>Clarification</p>	<p>(with permission) from the BGS data and is consistent with the iGeology app.</p> <p>Changes made to key as suggested.</p> <p>Scale of plan makes this difficult.</p> <p>Changed as suggested</p> <p>Changed as suggested</p>
<p>Remove exact location information for the lesser horseshoe bat colony in Colwall for bat welfare (disturbance) and public health and safety reasons. We don't want to encourage people to visit. Could instead refer to the hills having regionally important roosting and breeding sites for lesser horseshoe bats. Could also mention woodlands provide habitats for rarer bat species such as Barbastelle.</p> <p>Check status of Abberley and Malvern Hills Geopark - not officially recognised by UNESCO</p> <p>pg 4, paragraph referring to large leaved lime etc, doesn't make it clear you are referring to woodland species and woodland habitats, then jumps to grassland. Implies that species (dormouse and nightingale) are found in association with herb paris and large-leaved lime.</p> <p>Have nightingales been recorded recently?</p> <p>Reference to uncommon birds - woodpeckers in general or lesser-spotted woodpecker? Maybe include redstart as well (FRSM species)</p> <p>Adder's-tongue fern (just worth being clear its not a flowering plant)</p> <p>Keuper Marl isn't used any more (old terminology) usually refer to Mercia Mudstone Group these days</p>	<p>Omit sensitive info.</p> <p>Correction</p> <p>Clarification</p> <p>Corrections</p>	<p>Changed as suggested</p> <p>Changed as suggested</p> <p>Changed as suggested</p> <p>Changed as suggested</p>
<p>It might be helpful to make reference to the small surface water courses that run from the hills and out to the East. The Whippetts Brook LWS is especially notable and holds one of very few remaining white-clawed crayfish populations in Worcestershire. The small water courses that flow into the Severn are all subject to impacts brought out in later sections and so some commentary here may be helpful. More broadly it might be worth noting that the River Teme is an SSSI and that large tracts of the Leigh Brook and its associated corridor have various designations. Reference to the Malvern Hills as supporting one of the few remaining adder populations might also be valuable.</p>	<p>Small addition</p>	<p>Changed as suggested</p>
<p>Can we highlight the importance of a few other species for which the AONB is significant in a county if not regional context? There isn't any reference to reptiles (adder particularly) or dormice? I appreciate the species data can be sensitive when being pinned to geographic locations but can we find a way to include a mention?</p> <p>A good brief summary involving geology and biology, could include links for further information e.g. NOM Book. Species info needs checking -</p>	<p>Small addition.</p>	<p>Tables of NERC S.41 habitats and spp. added to page 5.</p>

carline thistle not carmine, bucks-horn plantain not born, skylark and wheatear have not bred on the Hills for many years now.	Corrections	Changed as suggested
We welcome the clear description in this section of the relationship between the landscape character of the Malvern Hills, and the specific historic management that has helped to support habitats and biodiversity, and represents an important part of local culture and heritage. We would like to see clear reference in the opening paragraph to the influence of human settlement and activity as a tangible and important element in developing the natural landscape we have. We suggest the following amendment:varied geology, influenced by the agency of human land management over the centuries, arise....	Small addition	Noted. No change because would complicate and alter the sense of the paragraph.

THE STATE OF NATURE IN THE AONB

5. If you have any comments, corrections or suggested additions to the section on the State of Nature in the AONB, please state them here.

Comment	Assessment	Action
May be useful context for the forthcoming Local Nature Recovery Strategies covering the MHAONB. Welcome acceptance that some change to landscapes and habitats (and to agriculture/forestry) is inevitable. Perhaps some brief mention of air quality in the MHAONB would be a useful addition somewhere in the 'Current and future pressure' sub-section (as affected by agriculture and traffic - now and in the future, which may include some improvements in N deposition etc.. Maybe also a brief mention of nature based solutions as a concept under 'Carbon Market' or a 'Changing place for Nature' such as Natural Flood Management. Is there a view on tree planting for climate change mitigation and nature recovery? May be later in the Plan though?	Small addition Small addition	Reference to air quality added under 'Built development' Sentence added to first para p 10.
Page 6 - Designated sites. In addition to SSSI designations, there are of course other designations, eg Local Geological Sites (LGS), which are very important to the geo-conservation work within the AONB. Assessments of several areas within the Malvern Hills geological SSSI were undertaken by EHT under contract from Natural England in 2019: is this data available to the AONB?	Small addition Question re data available to the AONB	Reference to LGS added. Noted.
Page 9, fourth paragraph. Although geology may not be generally susceptible to climatic change, contemporary erosion and deposition rates in streams and on hillsides certainly are! Also, accessibility to view geological features by the public or scientists is affected by increased rates of vegetation growth.	Clarification	Sentence amended.
2nd para agriculturally improve (d). Format of this page is a bit confusing. Better to have the maps and narrative on one page and push the designated sites onto a new page. Climate change reference "The longer term effects will depend on measures by governments and individuals over the next few years." perhaps reword to actions by governments and wider society over the next few years.	Reformatting Clarification	Section on designated sites moved to following page. No change.
Rather than referring to visitors, perhaps use recreational users instead. Also loss of tranquillity not the only impact of increased recreational use of the hills, path erosion, disturbance of wildlife and habitat degradation due to volume of people using the hill. Maybe a catch all phrase such as degrading the natural environment and character of the AONB. How does increased recreational pressure increase light pollution?	Clarification Clarification	Changed as suggested Sentence restructured.
This section references FIPL (not expanded on or explained earlier - perhaps on page 2) and references delivering nature and other public goods - not clear what they are, perhaps refer back to diagram on pg 2 of ecosystem services as a description of "public goods". also delivering	Clarification	Reference to Fig 1 added.

<p>nature's recovery. BNG. "The AONB should also be looking".... very passive. The AONB will investigate, or The AONB aspires to implement Community interest - Question? Is the AONB the best body to "Intervene" in the relationship between individuals and land use, or is the role more around advice and guidance as to appropriateness of actions and promoting best practice? Changing place for nature. Special qualities and non-negotiable. This section seems unclear and non-negotiable may not be the best terminology given we're talking about fundamental changes and we honestly don't know what's coming. Mitigation and adaptation to ensure the long term future of the AONB status.</p>	<p>Rephrasing Question Clarification</p>	<p>Changed as suggested. No change. Plan advocates advice and guidance as preferred approach. No change.</p>
<p>I have been involved in breeding bird surveys in the AONB for over 25 years. We have lost species especially long distance migrants but have also gained species. The area is important for breeding birds and the key to this is habitat diversity. It is critical to maintain this diversity and in particular recognise the importance of scrub for breeding birds as this is often ignored as a habitat to be conserved.</p>	<p>Small addition</p>	<p>Role of scrub is referenced in the Plan.</p>
<p>Interesting to note the increase in woodland since the 1930s. Given the number of Local Wildlife Sites (28 within the area of the AONB in Worcestershire), which can be as ecologically important as SSSIs and will form much of the core nature recovery network, it could be worthwhile adding a paragraph to the 'Designated Sites' section to demonstrate the wider network of other sites of local importance for biodiversity which the AONB contains. The paragraph could read 'Areas that are considered of at least county importance for their biodiversity are designated as Local Wildlife Sites (LWS). These sites occur more frequently across the landscape than nationally designated sites and are often of equal quality to SSSI's if managed favourably. Local Wildlife Sites are key elements of the ecological network spanning the AONB and their restoration, management and integration into a more biodiverse landscape will be an important consideration in delivering the plan objectives.'</p>	<p>Addition of LWS – new para is suggested</p>	<p>Suggested paragraph added.</p>
<p>Under 'New Opportunities' it might also be worth considering a small section on private investment in nature-based solutions, such as carbon and biodiversity units, natural flood management and reduced water treatment costs. For instance, Natural Flood Management could become increasingly important in the future and would help to offset some of the water management (and water quality) challenges mentioned elsewhere in the plan.</p>	<p>Small addition</p>	<p>Additional text added.</p>
<p>AONB Purposes. It is encouraging that under 'A changing place for Nature' (p9) the Plan states that 'we may need to alter our perceptions of treasured landscapes'. Indeed, what is good for 'landscape character' is not necessarily good for nature; some of the most majestic and beloved landscapes in the UK, from a human perspective, are unfortunately the most nature impoverished. We appreciate that balancing the need for change with the purposes of the AONB is a huge challenge, but strongly support its aspiration to understand 'whether or which of the AONB's special qualities are 'non-negotiable'and which might be reimagined or adapted for the future'. If there is to be a further iteration if the plan in a few years' time, a widespread consultation in the interim with stakeholders and members of the public would help develop these priorities, and also be a great way to engage people.</p>	<p>Recommendation for future iteration of the Plan</p>	<p>Noted.</p>
<p>Native and non-native. In the context of woodland management, is there an aspiration, over time, to replace non-native trees, including sycamore, with native trees? If so should this be covered in the NRP? On woodland cover "However, it is not all bad news. The area of woodland in the Plan area has increased significantly in the last 80 years.</p>	<p>Question</p>	<p>Noted. Q not directly addressed in Plan.</p>

<p>This is partly due to the self-seeding of woodland onto steep ground on the edges of the Hills (replacing the acid grassland) and partly due to new planting on farmland in areas such as Longley Green, Mathon, Beggar's Ash and Bromesberrow Heath."</p>		
<p>The first guiding principle listed in "our strategy for nature" is "ensuring better condition of what we have". Given that acid grassland is a priority habitat of high environmental value the emphasis here should be on maintaining or restoring the existing priority habitat rather than allowing secondary woodland to encroach. The existing acid grassland is already under pressure from other factors such as recreational pressure and further habitat fragmentation through new woodland cover should be avoided. For example, areas like Old Hills Common has lost a big area of grassland. These losses are illustrated really well on the 'getmapping' website, where you can view 1940s aerial photography against 2020/2021 photos. We do need to increase the cover of woodland along with restoring soil carbon for the purposes of climate change mitigation and adaptation, but this should be prioritised in areas that are of lower environmental value, or in areas of high nature value a focus on mosaic habitats, enhancing or creating new hedgerows and maintaining/managing existing priority woodland habitat.</p>	Clarification	Amended the text to acknowledge the loss of acid grassland.
<p>BNG - I think the AONB should aim higher than 10% - it also must be very careful in the sort of habitats required as part of the BNG - not just a uniform monoculture of trees. Diversity in a rich mixture of native plants, grasses, hedges and trees (useful carbon sinks). In addition, we have a great opportunity for our local food and drink sector which the AONB could help showcase (local high welfare meat, brewing etc).</p>	Noted.	As above.
<p>There is no mention of Local Sites here, which seems like an oversight. They are a hugely important part of the ecological network.</p>	Addition	Reference to LWS (and LGS) added.
<p>Current and future pressures section, in the built development paragraph – the cumulative impact of small/in-fill development is I think worth mentioning, as it is potentially harder to track impacts and also harder to achieve cohesive mitigation or gains for the natural environment. Is it also worth including a paragraph on rising fuel prices (gas/petroleum) in this section? Will this have an impact on land use (and prices of land) through a desire for more land for biofuels, for land for renewable energy (solar etc) or pressure for certain types of woodland management if use of solid fuels increases?</p>	Addition	Point about infill development noted but no change in report considered necessary.
Addition		
<p>That's a helpful section. Demonstrating progress in the future will be difficult without a good baseline to compare against. For example the amount of woodland present.</p>		
<p>State of Nature is discussed using 1 extent of habitat and 2 condition of designated sites, soils and water which is fine. However there's no mention of species - either population declines/ contractions or species lost from the AONB either historically, red-backed shrike, or more recent, High Brown fritillary. This would help tell the story and provide background especially as it highlights 'species reintroductions' later on. 'New opportunities' is a useful shop window of contemporary offers to land managers, but it's not part of State of Nature, it's social context.</p>	Additions	Table of species added to page 5. 'Populations of some important species have contracted or been lost' added to para 2.
<p>We have limited comments on this section. We would like to see reference in the Biodiversity Net Gain requirements section to other landscape values which would encompass the historic environment. We suggest the following amendment to the last sentence of the first paragraph of this section to read '.....greatest benefits to nature, local communities and the other special qualities of the AONB.'</p>	Small addition	Changed as suggested

OUR STRATEGY FOR NATURE

6. Do you agree with the five guiding principles in the Strategy section? If not, please say what you would change.

Comment	Assessment	Action
This a solid overarching principles which may be good to pick up on in Local Nature Recovery Strategies? Numbers 1 to 3 are well known/used before but numbers 4 and 5 are critical for wider success and the challenge before us all.		
Page 12. Although landscape types identified include both wooded and pastoral, the vital habitats of 'wood pasture' do not seem to be acknowledged , although there must be plenty of scope for these within the AONB.	Addition – check if already covered	Wood pasture is referenced on several pages including p4, 5, 14 and 16.
Page 17. It is surprising that the management priorities for Arable landscapes do not include explicitly the elimination (or at least reducing) the use of agrochemicals , which are likely to be a major cause of habitat deterioration in this type of environment within the AONB.	Addition re reducing agrochemical use.	Additional bullet added to p17.
Page 20 Case Study 3. Good example, thanks.		
Point 1. The narrative doesn't really say how better condition will be achieved. The emphasis is on retention and no further loss. Management options e.g. grazing and coppicing are not blanket approach	Clarification	No change.
2. Bigger and more joined up - agree		
3. Harnessing Community Support doesn't work for us as a principle. How about Creating opportunities for community participation, support and action	Suggested rewording of Principle 3	'and action' added to P3.
4. The principle here is about "Remove barriers to participation to deliver a shared goal."		
5. The past isn't necessarily a guide to the future - unless you're a geologist! We feel that there's a tension here between the changeability and the changes that will come AND the preservation of the special qualities. What's negotiable, how do you value one against another what are the trade offs? This one doesn't scan for us at all and is this really a principle that you want to hang your hat on?	Criticism of Principle 5	No change to P5. Others have responded positively. Is designed to reflect the scale of change and need to respond proactively.
Yes in general. However I would like to see more emphasis on the re-introduction of species , previously present on the hills, where the habitat is again suitable for them to thrive. I am thinking particularly of butterflies. In addition, it would be good to recognise the importance of providing support for existing breeding birds by providing nest boxes in woodlands and for Swifts in urban areas.	Suggested addition.	No change. This principle focusses on habitat networks (within which spp reintroductions can take place.
Yes		
We support and fully endorse the five underpinning principles set out on page 10 of the plan.		
We agree with the five guiding principles.		
I know it is a taboo subject but in my humble opinion we will not see wildlife numbers recover until there is some form of predator control and there is no mention of this in the report. I have lived in the valley between the Suckley Hills all of my life and the habitat has improved dramatically but wildlife that people want to encourage has decreased, I would suggest the wildlife balance is now completely different and I can't attribute this to anything other than predation.	Suggested addition.	No change. Recognise the point but not considered a priority as one of the five principles.
Yes		
Yes - really like them; especially number two. Linking habitats is really important in encouraging recovery. Where hedgerows are mentioned, it would be good to also include some reference to laying hedges rather than just cutting them, to maintain the	Suggested addition.	No change. Recognise the point but not considered a priority as

thick bushy growth which is necessary for wildlife. A minor point but there's so many neglected hedges around!		one of the five principles.
Agree with all of them, but think it's important that the language throughout the document reflects the scale of the nature recovery challenge, and this is especially so here. The wording might benefit from being a bit punchier to inspire a greater sense of ambition and urgency.	Rephrasing – punchier wording	
Yes		
Yes I agree with the 5 guiding principles which seem sensible and are readily understandable. Accepting that the past is not necessarily a guide to the future is a key aim. Climate crisis is likely to mean that some types of plant may no longer flourish in the area in the future. Furthermore, whilst traditional orchards are a fabulous habitat for wildlife they are less commercially appropriate compared with modern bush orchards. We need to recognise and achieve a balance between economically viable food production and habitat by giving both orchard types space to exist and flourish.		
1 - good. 2 - good but needs to be clear that it may involve change of land use. 3 - good. 4 - I don't understand 'stepping stones to improvement' title or text. 5 - good.	Clarification	P4 re-titled
A nod toward supporting natural processes would be good, nature isn't just a collection of features. Sustainability - should include support for low-input farming systems, low reliance on fossil fuels i.e. the way in which nature-friendly farming is done.		Mentioned at points in plan.
We welcome the clear reference to the Malvern Hills AONB being a 'cultural landscape' where nature and people have evolved together and the recognition that nature recovery must work with the functions and fabric of the landscape which includes its historic landscape character and archaeological features. We agree overall with guiding principles 1-4. Actions under principle 1 can have a huge benefit to the conservation of the historic environment resource and we look forward to working with the AONB in developing actions that can both safeguard the historic environment at the same time as boosting nature recovery. We encourage the integration of the historic environment into guiding principle 2. Integrating our understanding of the historic environment into the planned spatial approach will provide the opportunity to achieve multiple benefits from the ambitious programme of nature recovery. Opportunities exist to protect important below ground archaeological remains, improve the setting and condition of a visible heritage assets and strengthen our historic landscape character. We would encourage use of readily available datasets on the historic environment such as designated heritage assets, historic landscape characterisations, SHINE (selected heritage inventory for Natural England) and the local Historic Environment Records as part of the spatial planning.	Small addition	No change – Principle two relates to ecological links. But Plan as a whole recognises importance of wider spatial planning including the Historic environment
The title of guiding principle 5 is perhaps a bit ambiguous , particularly given earlier statements about the types of traditional land management that support biodiversity (eg coppicing, traditional orchards, extensive grazing). Could this perhaps be reconsidered in its title? A suggestion would be 'Increasing climate resilience'. An addition to the text would also be welcome, which recognises that we can learn from that past , including the types of traditional land management have a continued role to play in conserving landscape character and supporting biodiversity. This would not preclude recognising that the challenges of the climate and biodiversity crisis will also require informed, dynamic, innovative approaches to support nature recovery and climate change adaptation.	Clarification Small addition	Noted – but the intention of the principle should be clear to the reader

7. Do you agree with Priority A 'Promoting land management opportunities for nature' (pages 12-18)? If not, please say what you would change.

Comment	Assessment	Action
Yes generally in the context of the existing purposes of an AONB. Most interesting to us is the nature network opportunities (as mapped by GCER) as this will be an important basis we think to the Gloucestershire Local Nature Recovery Strategy.		
Yes		
Perhaps reword - promoting land management opportunities to benefit nature.	Rephrasing	The titles of all three Priorities have been changed. A new para on page 12 explains principles are about 'how' and priorities are about outcomes.
The bit in the box on pg 11 is unclear. Not sure what's being offered here, is it guidance, incentives or opportunities or combination? Struggling to follow what are priorities, what are principles and what the sub-headings are at this point.	Clarification.	
Woodland - implies that management is required for all woodlands, coppicing is not always beneficial for some species , where are the markets for coppice products or woodland waste. What is the strategy for deer and grey squirrel? Some rare bats and birds favour less managed woodlands with a dense shrub layer.	Questions and comments re woodland management	Coppicing is given as an example not a requirement. Squirrel and deer control is considered implicit in 'sustainable forestry practices'
Pastoral Landscape - high nature value. New woodland in this landscape could be seen as large scale, perhaps this wording needs to be modified to reflect scale and landscape character.	Clarification.	Added 'appropriately sized' to second last bullet, page 16.
Arable landscape - soil health could include soil invertebrate diversity.		Soil invertebrates considered part of soil health.
Yes		
It might be helpful to make an explicit reference to encouraging new planting (with appropriate stock in appropriate places) in the Highly Wooded Landscapes section on page 14. This will be a key element of re-linking previously fragmented areas of ASNW and so it seems appropriate to mention here.	Additional management guidance suggested.	Added reference to reconnecting fragments of ANSW.
Under the Pastoral landscapes with frequent high nature value habitats section it might be worth a comment on supporting grassland reversion from arable to deliver the bigger, better and more joined approach embraced by the plan. We note that this is brought out in the next section and that there may be relatively few places where this would be relevant in this part of the AONB but a comment such as ' encourage reversion of arable land to grassland where this would be appropriate ' might nonetheless be worthwhile here. Additional priorities for this landscape zone might include creation of additional traditional orchards.	Additional management guidance suggested.	Arable reversion is mentioned in the following section (p16). It is not excluded from p16.
In addition, the role of Predominantly arable landscapes in providing ecosystem services such as water quality improvements, carbon storage and natural flood management could perhaps be better emphasised, as well as opportunities for landowners to better deliver them. For instance, on-farm constructed wetlands serve a valuable role in treating agricultural pollution and creating a habitat for wildlife. In the same vein, inclusion of rough grass margins as a priority action to provide habitat and buffer hedges and watercourses could be extended to buffering of ponds and wetlands too.		Water flow regulation is mentioned. Unsure about scale of carbon and water quality services in arable landscapes, relative to other areas

<p>Trees and Hedges. We note that in the NRP, Colwall lies within an area categorised as a mixture of ‘Highly wooded’ and ‘Pastoral landscapes with fewer Nature Value Habitats’, the implication being that there is scope to do better. As a parish council, we are always mindful of the impact of planning applications on biodiversity, but we are also in the process of undertaking tree and hedge surveys in order to establish baselines, monitor loss and identify opportunities for improvement. We support the land management priorities listed in the NRP and commend the efforts of the Malvern Hills Trust, Colwall Orchard Group and individual landowners to improve tree and hedge cover. We also support the NRP’s continued commitment to working with landowners, noting that whilst there have been some notable efforts, some areas of wood pasture are not being replenished and are in decline.</p>		
<p>Verges. Several parishioners, under the auspices of the Colwall Orchard Group, have participated in projects to improve wildflower verges. Under ‘Pastoral landscapes with fewer Nature Value Habitats’ (p16) may we suggest an additional land management priority to restore/reinstate roadside wildflower verges?</p>	<p>Additional management guidance suggested.</p>	<p>New bullet points added to page 17.</p>
<p>Adjacent unenclosed landscapes. Colwall parish is bounded on the eastern side by the unenclosed acid grassland and heathland on the tops of the Malvern Hills, which is familiar to and beloved by many parishioners. We note that in the land management priorities for these areas (p13) there is no mention of protecting habitats for ground nesting birds, in particular skylark which used to be numerous on the high hills but has declined significantly. May we suggest amending bullet point 3 to:</p>	<p>Additional management guidance suggested.</p>	<p>Phrase added.</p>
<p>• Using grazing and manual scrub clearance to maintain a balance between open land, scrub land and, on the ridge slopes, woodland, and leaving patches of <i>deschampsia flexuosa</i> (‘wavy hair grass’) ungrazed from early summer on the Beacon and North Hill in order to provide skylark with vegetation of sufficient height in which to nest and forage. Regular management will be needed to keep a mosaic structure on the slopes where bracken, brambles may otherwise dominate.</p>	<p>Additional management guidance suggested</p>	<p>Noted. Need to avoid being too specific and detailed.</p>
<p>And an additional bullet:</p> <p>• Using intensive grazing on areas of the high hills where <i>holcus lanatus</i> (‘Yorkshire Fog’) grass has encroached on <i>deschampsia flexuosa</i>.</p>	<p>Question re clearance of vegetation in quarries</p>	<p>Noted.</p>
<p>Quarries. One of the land management priorities under ‘Highly wooded landscapes’ (p14) is ‘protecting the geological heritage value of quarries, keeping rock faces clear of soil and vegetation’. Whilst we do not disagree that quarries have heritage value, we question whether it is necessary to clear all re-vegetated quarries, as they could have ecological value, as well as the capacity to improve amenity by covering scars left by extraction activity.</p>	<p>Addition suggested</p>	<p>Deer management is included as an Action. Implicit in sustainable management.</p>
<p>Yes In “highly wooded landscapes” is there an opportunity for partnership/landowner initiatives around deer management? This could be linked to the local produce/reduced food miles mentioned earlier. Woodland creation being prioritised in pastoral landscapes with fewer HNV habitats and arable landscapes welcome.</p>	<p>Addition suggested</p>	<p>New bullet point added plus ref to diffuse pollution.</p>
<p>Predominantly arable landscapes – could be worth mentioning winter cover crops and addressing diffuse pollution? Much of the area is in a high priority water area so there are opportunities for initiatives like catchment sensitive farming.</p>	<p>Addition suggested</p>	<p>Reference to nature-based solutions added.</p>
<p>The state of water and wetlands is mentioned on page 7. Across the priorities an emphasis on restoration of natural function and working with natural processes to reduce flood and drought impacts would be welcome.</p>	<p>Yes - pragmatic solutions.</p>	<p>The section on page 7 detailing the condition of key natural assets</p>

<p>identifies the widespread impacts of diffuse pollution and sediment runoff on waterbodies within the Plan area, and also the issue of damaged and depleted soils and the use of agrochemicals. These are major issues that underpin the ongoing decline in quality and condition of the natural environment and if not addressed it's difficult to see how real widespread, positive change can be achieved for nature. Land management priorities to address these key issues could be reflected more strongly for all the simplified landscape types.</p>	<p>Additional management guidance suggested</p>	<p>New bullet points added where there is space to do so (e.g. arable landscapes).</p>
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Page 14

The comments on creating a mosaic on the slopes of the the hills are fine. However the high hills are a different matter. A paragraph should be added:

"The management regime on the high slopes of the hills needs to be studied to understand how different grazing regimes - and in particular the current intensive grazing - affect scrub control, invasive species control (bracken and Yorkshire Fog), biodiversity and visual amenity.

The high hills are suffering from increasing invasion of coarse Yorkshire Fog grass and bracken smothering the fine wavy hair grass. Yorkshire fog is very damaging to insects, plants, mammals not just skylarks and meadow pipits that avoid it. It is unpalatable to stock and they eat other grass first. Seeds can be introduced by cattle dung especially in areas they have trodden bare (poached). The spots near the cattle watering stations were among the first to get invaded and there was very little Yorkshire Fog around before the cows were bought back in 2010 after 10 years absence. Yorkshire fog benefits from the fertilising effect of cattle dung and nutrients fixed by bracken and gorse as well as further poaching. Natural England's grassland management expert advised that Yorkshire Fog increase was to be expected after gorse and bracken clearing but that it could then be controlled by grazing and is normally short lived once the nutrients have been depleted and the much more species-rich wavy hair grass could return. The gap in the plan is that it is not being grazed because the animals don't like it.

Specifically on skylarks - Skylarks need a chance to raise their three broods from March to July. The longer grass in their favourite spots on the high hills and commons was long enough in March to get them started and never got too long. But now it is grazed too tightly the summer before to recover in time.

They do not seem to need big areas of the right 20-40cms grass - patches of 20m across are competed for.

They will go where the conditions are right - a nice quiet spot where they used to breed but the grass is too short is no good. A busy spot near the crowds with the right grass is not ideal but better.

That they like the high hills as well as the commons is evident because they have been there for centuries.

The grass cannot recover by March if it is tightly grazed late the year before. There was a skylark on the Beacon singing this March but it did not stay for more than a week and did not breed.

What specifically is proposed?

High grazing pressure is a known control mechanism for Yorkshire Fog. The solution is to fence stock into the Yorkshire Fog areas to force them to eat it and leave more of the nice wavy hair grass for the skylarks, meadow pipits and grasshoppers. Win win.

Concentrate stock on the Yorkshire Fog areas on the high hills - there is plenty of it where bracken has been rolled and gorse cleared and cattle will eat it.

Leave significant patches hectare of wavy hair grass ungrazed from early summer in an area previously inhabited with skylarks on the South West slopes of the Beacon and North slope of North Hill and on Castlemorton Common

Correction / Additional management guidance suggested

Addition text added to 3rd bullet, page 14.

Detailed comments on habitat management on the Hills

As above.

<p>Graze remaining Wavy Hair grass areas less intensely Set up a simple project to monitor the impact of these regimes on biodiversity and scrub control. There is no data now available. Reducing grazing intensity could give the high hills their rugged natural feel back again with 30 cm or so of fine wavy grass flowing in the breeze rather than the short tightly grazed sward with little insect life we have now.</p>		
<p>Absolutely. Encouraging farmers and landowners to change land management practices is key.</p>		
<p>Right idea - change needs to happen and will be done by third parties who may be nervous about the whole thing. However, all the verbs are somewhat too passive - 'considering guidance' is not going to 'halt and reverse this decline' in wildlife which is the aim of this whole Plan. What about: encourage, facilitate, find ways to help land managers make real changes on the ground...?</p>	<p>Re-phrasing</p>	<p>No change. Emphasis on plan is consensus building.</p>
<p>Pages 13-17 read as a re-hash of the AONB's existing Mgt Plan. It could be far more ambitious. why not include desirable outcomes for certain areas of the AONB flagged up - we'd like to see an increase in traditional orchards to the west of Colwall, possibly even with a target hectareage. or improved hedgerow connectivity around Eastnor with a target of 25km new native hedgerow etc...</p>	<p>Call for more detail and targets</p>	<p>No change. Noted. For next iteration of the plan.</p>
<p>Figure 11 - is a great idea but this map is very hard to understand both the terminology (high priority opportunity) and the colouring - the Malverns don't seem to be existing priority habitat? the purples and browns are so similar it's near impossible to tell them apart.</p>	<p>Clarification</p>	<p>No change. Fig 11 is deliberately indicative and large scale. Approach will be developed and extended.</p>
<p>We agree with the overall principle of Priority A. Priority A in its promotion of opportunities for nature has the potential to substantially benefit other special qualities of the AONB including the historic environment, however there can be a risk that some actions can also cause harm. Embedding an understanding of the historic environment into the targeting of opportunities will maximise the benefits and minimise the harm in a manner consistence with national policies and strategies.</p>		
<p>We therefore request a minor change to the second sentence of the 'A starting place for dialogue' section. We suggest the following '...it may be that special features and relatively uncommon land holdings require a different approach informed by available evidence'</p>	<p>Addition</p>	<p>Changed as suggested</p>
<p>We welcome reference to some of the most prominent heritage assets in the AONB and would encourage further reference to heritage designations in this section, particularly scheduled monuments, and registered parks and gardens. These designations recognise the special historic interest and national importance of these sites and relate closely to land management. In the case of scheduled monuments there are statutory protections.</p>		
<p>We would also welcome signposting to historic environment records and historic landscape character assessments, as sources of information to support conservation of landscape character, heritage and cultural value, and identify opportunities to support ecosystems services. We welcome reference to historic landscape characteristics in the priorities for this section. We encourage strengthening of the connection between good management for nature and the historic environment by developing priorities that emphasise a mutually beneficial approach. A simple way to achieve this would be including a priority such as the following 'Sustain and enhance the significance of other special qualities of the AONB, such as the historic environment, through nature recovery actions that are beneficial to those other qualities'</p>	<p>Additional priority</p>	<p>No change. Primary focus of plan is on nature</p>

8. Do you agree with Priority B 'Connecting people to nature in the AONB and its setting' (pages 19-20)? If not, please say what you would change.

Comment	Assessment	Action
An important but challenging aspect. Agree is important. No changes recommended.		
Yes		
Connecting people with nature is vitally important. Remove barriers (ask people what their barriers are), provide opportunities to get out and about or taker part, encourage and inspire to get out, to engage and to feel part of nature. Get them while they're young.		
Yes		
In general, yes. However, it may be worth reflecting on the considerable impacts recreational pressure is already having. Given the welcome positive messages this document is promoting it may be worth simply opening the first sentence with 'Recognising the significant recreational pressures that the AONB faces, reinforcing people's positive relationships with nature, encouraging their understanding, and reinforcing the benefits that it provides them with is central to achieving nature's recovery.	Suggested additional text	No change. The point is noted but adding it here would detract from the purpose of this section, for there is strong support from others.
We agree with Priority B		
Yes. Are there opportunities for things like green social prescribing?		
Broadly yes - but beware of becoming too preachy or using well known celebrity champions. This should be bottom up, and grow organically from the community, local land owners and other users of the AONB area and its surrounds (recreational users, sporting users etc). It would be nice to see positive engagement from the community so encouraging nature groups to get involved along with groups like the cycling groups who also use the area, also schools. Both the local schools run forest school for infant classes which would be a great opportunity to engage young minds in preserving and enjoying nature. It would be good to see more clarity on any action to address the disparity between over exposure (erosion) of the hills and access to the hills by walkers and cyclists.		
Partnership working for a unified approach... this could be really important, focusing on consistent messages from key organisations such as MHAONB, WWT, HNT, MHT, NT, BC who manage land for nature conservation and support volunteer activity and interact with communities. Could there be a recognisable 'connecting people to nature in the AONB' brand/message adopted by all these organisations to be used in comms for all the work they do within the AONB? A shared mission statement?	Recommendation for future action	Noted
yes		
Yes, I agree. And hopefully this will be a case of pushing against a door which is already partly open...		
Good, but again seems like a re-hash of existing AONB texts.		
We welcome this priority. Enthusing the public and encouraging active participation in its care is fundamental to achieving support for all our environmental objectives. Active participation is a key outcome of Historic England's Future Strategy 2021 (https://historicengland.org.uk/about/what-we-do/strategy/) and we welcome discussion of how our strategy for the historic environment can align with the emerging nature recovery plan. We welcome reference to the work that has been achieved for historic orchards and would encourage reference to how nature benefits benefit protection of our historic environment. A suggestion on the first sentence of paragraph three is to include the following '...visit, filtering the air we breath or protecting our historic landscape character and its features, is.....'	Small addition	Changed as suggested

9. Do you agree with Priority C 'Strengthening the role of the AONB in the Regional Nature Network' (page 21)? If not, please say what you would change.

Comment	Assessment	Action
<p>This is of obvious importance to Local Nature Recovery Strategies and a consideration to try and weave in the spatial aspirations. as summarised in Figure 4.</p>		
<p>Yes</p>		
<p>Yes - AONB acts as a hub and reservoir for high quality habitats and species and strengthening connections to other protected landscapes is vital MHAONB sits at the crossroads of North South East and West corridors, so it's absolutely crucial that we stress its pivotal role in regional climate change adaptation.</p>		
<p>Yes</p>		
<p>It might be worth amending the second priority to read 'To work with partners including other protected landscapes, to promote and takes steps towards strengthening of connections to other regionally important areas. This might better reflect the required active implementation needed. Adding a fourth key connection 'to the east: the Forest of Feckenham (species-rich meadows, wood pasture and ancient woodland)' would tie in well with our work in this Worcestershire BAP Biodiversity Delivery Area. Although the connection is shown on Figure 4, picking it out in the text might help to emphasise the connection of the AONB with the wider landscape of Worcestershire.</p>	<p>Suggested clarification / additions</p>	<p>Added reference to Forest of Feckenham.</p>
<p>We agree with Priority C</p>		
<p>Yes</p>		
<p>Really important - these corridors should be protected from over development.</p>		
<p>Yes, this is an important part of the plan considering the Government's focus on Nature Recovery Networks and the requirement for production of Local Nature Recovery Strategies. It is important that this NRP informs and supports development and delivery of these other strategic plans. How were the 'lines of crosses' potential nature corridor pathways identified? Some of them do overlay the B-Lines, but not all or for their whole length.</p>	<p>Question on methodology</p>	
<p>yes</p>		
<p>Yes, this has to be a key aim of joining together core biodiversity areas in the region. I also think that consideration of the 3km buffer zone around the geographical area of the AONB is an exceptionally sensible approach.</p>		
<p>Good, but i'd query the amount of work that can actually be done toward this laudable ambition. Are the AONB's power not constrained to the designated area? or is this setting out work for NE et al - if so I'm not sure this point is clearly made.</p>		
<p>We welcome this priority and encourages the integration of the historic environment into this Regional Nature Network. There are pockets of landscape where land management has conserved areas of distinctive historic landscape or features, which often relate to less intensive agricultural regimes where natural environments values are also greatest. Opportunities to recognise the value of these landscapes and features in these networks and seek mutually beneficial outcomes for both the natural and historic environments are encouraged and would enhance public appreciation.</p>		

DELIVERY ACTION PLAN

10. Do you agree with the proposed actions? If not, please say what you would change.

Comment	Assessment	Action
A.1.3 is welcomed but as the MHAONB only covers a small part of Gloucestershire it is the priority C area we will be most interested in and proposed actions C.1.2 and C.2.2.		
Yes		
Yes, actions seem reasonable, stretching but realistic.		
Yes		
Yes, the actions set a good trajectory for the two-year timescale of the delivery action plan and the intention to regularly review and update during this period is a sensible approach given the evolving frameworks on which they are based.		
Biodiversity Net Gain. We note the introduction of a 10% mandatory Biodiversity Net Gain (BNG) which will require developers to create new habitats for those removed by land use change. We support MHAONB's aspiration to have a more stringent BNG requirement of at least 20%.		
As previously I would suggest addition of a plan for predator control or a least monitoring of numbers and their impacts on the wildlife species that are being encouraged.	Suggested addition	Noted. Monitoring can be included in D4 (page 26).
Yes		
Yes - these are mutually reinforcing.		
Yes - with the addition of a study and measures to mitigate the impact of intensive grazing as above.		
I think that the actions seem prudent.		
The actions are good and right. However, they seem to be what's in the AONB mgt plan already. the status quo has got us to the point described in the introduction and state of nature, so surely to halt and reverse nature decline, we need to do something new.		
We support nature recovery actions that protect or benefit the historic environment in the process of maximising natural environment gains. Therefore, we encourage integration of the historic environment into the spatial planning and development of suitable actions. We welcome the inclusion of Historic Environment Record data into the 'Sense of Place' diagram in appendix 1. To achieve this integration, we recommend the engagement of Historic England and local county archaeological services into actions A.1.3, A.2.2, A.2.3, B.2.1, C.1.2 and C.1.3. Historic England will be able to provide strategic advice on how the historic environment can integrate into nature recovery to achieve mutual benefits.	Support for actions	Noted

11. Please state which of the proposed actions (if any) you or your organisation might be interesting in leading.

Comment	Assessment	Action
Not relevant for us to lead given small proportional area involved.		
Anything that relates to the geological base		
Yes		
See comment for Q12 below.		
Any kind of communication to our parishioners.		
We may wish to take a leading role in action B.2.1. where this relates to coordinated delivery of Biodiversity Net Gain functions and the targeted investment of money arising from a local Biodiversity Credit market.	Willingness to lead an action.	Noted.
Participating in an impact of gazing study		
None directly.		
We would be happy to host/help deliver events on nature-friendly land management, balancing public access and wildlife, and using/managing	Willingness to lead an action.	MHT added to A.1.2.

various grant schemes.

As the plan is a nature recovery plan we feel it is for those agencies and groups with a natural environment focus to lead on, though we are an active and willing party to discussion to ensure actions and planning integrate and benefit the historic environment.

12. Please state which of the proposed actions (if any) you or your organisation would be interesting in supporting.

Comment	Assessment	Action
In some priority area C actions we would want to be involved as indicated at Q10 above.		
As in Q.11 above.		
A2.3 - tackling widespread non-native invasive species and deer/squirrel management initiatives A2.2 - would support and get involved B1.1 and 1.2 very high potential to support and maybe take a leading role, but perhaps other depts in MHDC B2 (all) support definitely but unlikely that MHDC would be best placed to take a lead role C (all) support and enable if necessary.	Willingness to support actions – Amend the table	Noted
Yes		
We are keen to build upon our partnership with MHAONB to work for a unified approach to nature’s recovery in Worcestershire and effectively engage with emerging funding streams and frameworks such as Local Nature Recovery Strategies, ELMS and BNG. Over the two-year timescale set by the delivery action plan, we will be a partner of the Severn Treescapes Initiative. We also see promising potential to join efforts to support other land managers in the Malvern Hills and surrounding area through the work of our neighbouring Facilitation Fund (subject to a successful application), provision of land management advice for Local Wildlife Sites and land neighbouring our nature reserves, and building on our hay exchange project to link species-rich meadows with restoration meadows. We can also support connection of people to nature in the AONB and its setting through our work with the Natural Networks programme, which is set to continue until June 2023. We would also welcome engagement with groups to tackle pressures which have negative impacts on high-value nature sites. For instance, we are concerned that well -intentioned delivery of the nature recovery network may lead to increased visitor pressure on high-value nature sites, and newly created habitats such as planted woodland may lead to an increase in deer. These pressures therefore seem likely to become more severe if not managed effectively.	Commentary on potential involvement in actions.	Noted. No changes needed
Please see answer at Q7 on tree and hedge survey projects.		
We are currently providing support around the Farming in Protected Landscapes scheme and will have a key role in supporting the development of the Local Nature Recovery Strategies.		
Any kind of community event.		
We can support delivery of actions in section C on strengthening the role of the AONB in the regional nature network. In particular, working with the AONB to ensure that the production of the LNRS will support delivery of regional connectivity priorities and opportunities, and supporting the delivery of landscape-scale project initiatives involving the AONB that meet LNRS objectives.	Support for action	Noted
With my involvement as a volunteer with Colwall Orchard Group (COG) I'd hope that the Group might be able to take part in the one-day celebration event since this could be mutually beneficial to both the AONB and COG.	Support for action	Noted

As above.

We would be interested in working closely with the AONB on the spatial planning and development of actions that can maximise nature recovery and resilience whilst also benefitting the historic environment. In particular, we welcome exploring areas where cultural and heritage values can support ecosystems services in the AONB and delivery of nature recovery.

The actions identified in our answer for question 10 are the areas where we feel we can be most effective.

MONITORING PROGRESS

13. If you have any comments on the section on Monitoring Progress, please state them here.

Comment	Assessment	Action
Some joint sharing of nature recovery progress may be possible with Local Authorities under processes of Local Nature Recovery Strategy reviews, periodic new Biodiversity Duty Reporting, Biodiversity Net Gain reporting and BNG register (all of these covered by the new Environment Act but not yet clear until consultation, regulation and guidance from government is complete, i.e. from late 2023).		
None		
Looks good so far, lets see what the 25 year Env Plan brings for monitoring. Interim monitoring indicators look reasonable.		
Monitoring and especially the long-term surveying of all wildlife is essential to the understanding of how the biodiversity of the area is changing and to adapt the habitat management if required.		
Any help with habitat surveys would be most appreciated		
The proposals seem sensible to us and eventual alignment with the monitoring under the 25-year Environment Plan would be helpful and offer a level of longevity and robustness to the monitoring suite. The Wildlife Trusts are working to develop suitable methodologies to monitor landscape scale conservation using indicator species which can align with the 25-year Environment Plan indicators, through projects such as Kent Wildlife Trust's Nature's Sure Connected project. The resulting report (https://www.kentwildlifetrust.org.uk/sites/default/files/2021-09/KWT_CE_Nature%27s%20Sure%20Connected%20practical%20framework_FINAL%20PROOF_v3_website.pdf) may help to shape thinking in the future, but this AONB plan provides a helpful guide to what is possible and proportionate for consideration in emerging LNRS and so the thinking done here is especially helpful and important.		
The interim measures seem appropriate and appear to span the range of elements underpinning 'success'. It might be helpful to try and capture some indirect impacts that affect nature though. For example, matters of recreational pressure and increases in noise and light pollution may appear tangential in this context but they certainly have an impact on existing sites that might not be captured by traditional habitat monitoring. Capturing data on change in these areas (perhaps from planning approvals, visitor surveys and the like) may be beneficial if it can be done in manner that is not unduly onerous.		
Please see responses under Q3.		
No - but would be interested in the metrics used.		
There may be opportunities to record and track private investment in nature recovery projects in the form of investment deriving from BNG offsetting. Local Planning Authorities will be required to report on this type of data so the AONB Unit may wish to engage with the LPAs to ensure that data collection resources are not duplicated and explore what data can be shared with the AONB.	Suggested monitoring of private investment in NRP	Noted
This is really important and substantially missing at present		

No comment.		
<p>This section seems very weak. if the earlier parts had more conviction, then it would be much easier to pull out SMART targets for monitoring, such as length of hedge planted.</p> <p>This plan needs proxy indicators to prove that this Plan has delivered toward the ambitious aim given at the start.</p> <p>See Isle of Purbeck nature recovery plans that give a great example of more specific actions.</p>	More specific monitoring targets	Noted. More specific monitoring targets may be developed in future iterations.
<p>We welcome the inclusion of National 25 Year Environment Plan indicator G2, condition of heritage features, in monitoring of progress with nature recovery in the AONB. Due to the limited number of designated heritage assets in the AONB we would encourage the broadening out of this monitoring ambition to include a representative sample of important, non-designated heritage assets (e.g. unregistered parkland, areas of well-preserved archaeological earthworks, buried archaeological remains under cultivation) that would enable a better presentation of how managed nature recovery can benefit the historic environment. We would see this as an exemplar model for application in other protected landscapes.</p>	Small addition	Noted. No change – G2 is the 25 YEP target.

ANY ADDITIONAL COMMENTS

14. If you have any other responses or suggestions to make regarding the Malvern Hills AONB Nature Recovery Plan, please state them here.

Comment	Assessment	Action
No additional comment		
Thank you for submitting the plan for review, Eastnor Castle Estate are supportive of the nature recovery plan and your efforts to improve the natural environment in the AONB.		
None		
Clarity over principles, priorities and actions - more of a formatting issue than a content issue.		
None		
<p>It would be helpful to present Figure 11 Enhanced Ecological Network Map as a web-based interactive map. The detail of the map is somewhat lost due to its limited size within the report, and the spatial context of land management priorities at a landholding level may be better communicated if a user can use the map interactively and be directed to the most relevant land management priorities for that location.</p> <p>The Nature Recovery Network may not meet all species' needs thoroughly, so within the current or future iterations of the plan it could be worth considering a list of priority species which reflect both local and national priorities, alongside species-related plans such as butterfly re-introduction projects.</p> <p>Capturing the thought processes and learning from development of this plan would be incredibly helpful in developing LNRS approaches across the county. A final report on the methods used to develop this plan would therefore be a useful adjunct to the plan itself.</p> <p>Overall, Worcestershire Wildlife Trust support the aims and objectives of the plan and recognise the leading role the AONB are playing in taking the first steps towards a Nature Recovery Network in our area. We look forward to working with the AONB as the plan evolves and is implemented, and we'd be pleased to discuss any of our comments if that would be helpful.</p>	Recommendation for development / web-hosting of Figure 11 map.	Noted. Potential for this as GCER's spatial definition improves.
Thank you again for inviting us to comment, we hope these points are helpful. May we take this opportunity to say how much we value our relationship with the MHAONB, which plays such a vital part in looking after the beautiful countryside in which Colwall is situated. We very		

<p>much look forward to working further with you in the future.</p>		
<p>Comments on the plan have been pulled together from colleagues who work across various work areas and are familiar with the AONB landscape.</p>		
<p>The plan is well written and formatted in an engaging way. The delivery action plan is welcome and is something that is often lacking in plans on a similar theme. The plan covers all the areas I would expect to see in order to develop a robust NRN including climate change, Lawton approach to habitats, species, importance of soil, community engagement, partnership working, preparing for ELM/BNG and working beyond the AONB boundary.</p>		
<p>Species are mentioned throughout the plan, but given the emphasis on them in the 25 year environment plan and environment bill it may be worth mentioning the key species in the AONB? There is likely to be increased funding available for species recovery going forward and their inclusion in the plan would align well with future opportunities.</p>	<p>Suggested addition of a list of key species in the AONB</p>	<p>Table of species added to p5.</p>
<p>This is a great blueprint; however small is beautiful - it is really important to get grassroots buy in, and not impose anything that could be seen as top down instruction.</p>		
<p>I think that this is a highly professional and well-produced document that gives a good general introduction to Nature Recovery in the MHAONB. I think that the report gives a clear idea of a future course of direction. It critically recognises that you need to fully engage with others - local farmers/landowners/communities together with other partners further away - in order to have a reasonable chance of having some tangible impact. It's a very broad and ambitious brief, which may viewed as being both a strength and a weakness. The strategy of using stepping stones to improvement recognises that this will, through necessity, be an incremental approach. One sentence leapt off the page to me and that was the reference on Page 1 to "the right balance of incentives, guidance and regulation". Let's hope that things like ELMS help to provide such a framework for us all to successfully work by.</p>		
<p>Thanks for the opportunity to respond to this consultation and I hope that you get positive reaction and support to this report from the local farmers, landowners and the wider community.</p>		
<p>Perhaps the Plan needs a long, high level version and a short, simpler version for land managers otherwise buy-in could be low.</p>	<p>Need for shorter version</p>	

Responses received by email

In the following table, **bold text** has been used to highlight specific suggestions for changes to the document. To preserve the confidentiality of respondents some text has been redacted.

Comment	Assessment	Action
Hi Paul, I've attached the doc with specific notes on it, just little bits and bobs. There are some excellent bits in there, I particularly like guiding principle number 5		Adopt changes suggested
Overall it is good and a manageable size but I did feel something was missing and I was struggling to put my finger on what it wasI think perhaps it is an overall ambition or vision statement up front. I feel like it makes suggestions about what individual farmers can do but it doesn't really explain why. Or maybe it's because there are no target type statements – Is that because you don't want to present a vision or targets without the agreement of farmers/landowners? If so then maybe one of the actions should be to develop that vision and the actions with a farmer/landowner group (to be informed by the NRN and ES mapping (and climate change info).	Need for vision	No change. Currently there is a lack of consensus from partners. Recognise potential value of a vision. Maybe addressed in future iteration of the Plan.
Perhaps rejigging the order of some sections would help. I thought putting the NRN map in from of the landscape zones would show the overall picture before honing in. I also think reordering sections A, B and C so that section C goes first and shows where the AONB sits in relation to the rest of the region, then section A would follow explaining what can be done within the AONB and it's immediate surround to reinforce and make connections. I know that doesn't quite sit with the order of the first step being making what you have better, but I think it makes it easier to understand why you need to make what you have better, if you do it that way round.	Re-ordering	No change. Order changed from what is suggested during an earlier iteration of the plan. Recognise there are pros and cons of different ordering.
Hi Paul. This was mentioned at our PC meeting on the 24th and Councillors decided there was not much which they could add to it, but congratulated you on all your hard work.		
Dear Paul. Thanks for the reminder about replying to the Draft consultation. I have read it /skimmed it and cannot say that I am likely to appreciate or find fault in such a complex and detailed document, which is designed to inform future generations of planners and developers as well as NGOs. The Malvern Hills Trust will no doubt be able to use the result extensively.		
I have deliberately not used the response form because of the above and due to my own lack of understanding about where the watercourses that originate in the AONB such as Whippets Brook and other bodies of water (such as fisheries, reservoirs and quarry pools) fall, whilst they obviously are mentioned briefly (condition of Cradley Brook) but the presence of White clawed crayfish-Australopotabius pallipes, which is a National and Worcestershire Biodiversity Action Species in some of them and the presence of Signal Crayfish - Pacificastacus leniusculus in many others seems mainly outside the AONB boundary, BUT sometimes well within the 3Km sphere of influence. But the preservation of our native crayfish and the quality of the streams in which it still lives clearly is.	Addition	Reference to crayfish on Whippets Brook added.
I am engaged in writing my report which will be based around the BDAP for White Clawed Crayfish and our suggestions for updating this, which if the suggested changes are adopted, will certainly have to be taken into account in any final plan for Nature Recovery in and around the Malvern Hills. In the meantime, both the Leigh Brook and Teme are suffering from chemical pollution, sedimentation from runoff and climate	Comment on	Noted.

induced events and are noticeably reduced in quality but reporting these and monitoring them is clearly the responsibility of the Environment Agency, English Nature and other interested parties such as the Canal and Rivers Trust etc.

Dear Paul. Thank you for giving us the opportunity to comment on the Malvern Hills AONB Nature Recovery Plan Consultation draft – January 2022. We represent the interests of 47,000 farm businesses in England and Wales. The plan sets out a number of themes that have a direct impact upon our members whose businesses form the bedrock of the rural economy in the Malvern Hills and the wider area.

Farmers are largely responsible for maintaining the special features that are valued in landscapes like the Malvern Hills. These features have developed as a result of generations of farming activity and there have been many changes over time. Farming businesses and techniques will no doubt continue to change and therefore the challenge is to grow sustainable and profitable farming businesses whilst also safeguarding the special qualities of the landscape

Farming businesses face many challenges and are currently in a period of considerable uncertainty. Many of their challenges are global as well as local as their activities are influenced by worldwide supply chains. In our view, support for farming, growing and rural businesses should not be confined to encouraging diversification and must include a focus on improving the competitiveness and quality of rural businesses. The UK food and farming sector is worth a staggering 108 billion to our economy, more than the aeronautical and automotive manufacturing sectors combined, and represents around 3.9 million jobs.

As you know much of the natural environment is farmland and it is maintained by farming businesses who make considerable and long term investments in maintaining environmental and landscape features. These combine to create a landscape that has a wide economic benefit for communities and other businesses alike.

We are supportive of the Nature Recovery Plan and the themes you have set out. That said, **we would want to emphasise the need for farming businesses to be supported throughout the Agricultural Transition period until 2027, with a clear focus on reaching net zero carbon emissions by 2040, nature recovery strategies and practical support for the Farming in Protected Landscapes fund. The new Environmental Land Management Scheme is under development and there are likely to be some opportunities for farmers within the AONB.**

Additional
emphasis

Noted

All of the objectives from the plan need to maintain the farming businesses profitability at the forefront. **Future activity should acknowledge environmental work already conducted voluntarily by farmers across the Malvern Hills AONB area and support given via advice and monetary compensation to maintain and enhance these good works.**

Noted

We also have the following specific comment on the plan:

Page 7 agricultural soils – **Could you acknowledge the recent and significant change in farming practice around soil management.** As you know many farmers in the area are bringing in new practices that boost soil health and structure and seeking to increase organic matter, for example, minimum tillage, cover cropping. Soil conservation is now a mainstream activity within the farming sector. **A reference to this on page 17 would also be welcome.**

Sentence added
acknowledging adoption
of new practices.

I hope that you find our contribution to the consultation useful. We are keen to assist the council with the development of this plan so if you

require further information or clarification of any of the points raised in this response please do not hesitate to contact me.

Hi Paul. Thank you for the extra time to look over the Nature Recovery Plan. It was very readable and certainly gives an idea of the area and diversity as well as the challenges the MHAONB face. Given the complexity of the land usage and ownership I think it strikes the right tone. We are very aware of the delicate process of working with landowners. I am afraid there is little I can contribute to the overall plan.

My only comment would be:

The area around Upper Colwall is described as “Highly Wooded Landscape” (Page 14). One of the Land Management Priorities: “Conserving remaining traditional orchards, using restorative pruning to prolong the life of old trees as well as restocking with traditional varieties on standard rootstocks”

In contrast Colwall Stone, Green and Old Colwall is described as: “Pastoral landscape with fewer high nature value habitats” (page 16) and no recommendations for traditional orchards. Given that there were a large number of traditional orchards in this area (and some still exist) I was wondering if we could include the same statement on page 16.

Addition

Orchards added to first bullet, p17.

With the number of people interested in meadows and orchards it would be interesting to look into the benefits of developing wood / orchard pastures to increase biodiversity.
